

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Huzhou Chuangtai Rongyuan Investment  
Management Partnership, Huzhou Huihengying  
Equity Investment Partnership, and Huzhou  
Huirongsheng Equity Investment Partnership,

Petitioners,

-v.-

Hui Qin,

Respondent.

1:21-cv-09221-KPF

**DECLARATION OF  
XINTONG ZHANG**

I, XINTONG ZHANG, declare as follows:

1. I am an associate at the law firm of Seiden Law LLP (f/k/a Seiden Law Group LLP) (“Seiden Law”), which is counsel for Respondent Hui Qin, (“Qin”) in the above-captioned matter. I am admitted to practice in this Court. I make this declaration based upon my own personal knowledge and documents in the possession of my firm.

**Qin’s Responses to Petitioners’ Document Demands**

2. On October 31, 2022, Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership’s (“Petitioners”) served their First Set of Post-Judgment Demands for production on Qin (“Demands”). On November 9, 2022, in compliance with the deadline set by the Court in its order dated November 1, 2022 (ECF 64), Qin timely responded to Petitioners’ Demands. In his response, Qin agreed to produce responsive, non-privileged documents in his possession and control in response to *all* of Petitioners’ requests. *See* ECF 108-5.

3. On November 16, 2022, Petitioners requested to meet and confer with Qin on his responses and objections to the Demands. On November 18, 2022, counsel for Qin and Petitioners

conducted an extensive meet and confer videoconference to discuss Qin's responses and objections. During the conference, Petitioners agreed to consider Qin's objections and indicated that they would send a letter responding to Qin's objections. ECF 94, at 2.

4. On December 12, 2022 (over three weeks after the November 18 meet and confer), Petitioners sent a letter following up on the issues raised during the November 18, 2022 meet and confer. In this letter, Petitioners agreed that the relevant time period for their Demands would start on March 15, 2017 (not January 1, 2017 as originally defined in their Demands).

5. Attached to this declaration as **Exhibit A** is a true and correct copy of Petitioners' December 12, 2022 letter.

6. On January 3, 2023, following several weeks of discussions among counsel for the parties regarding a proposed protective order, the Court approved the agreed protective order that was submitted jointly by the parties. ECF 92.

7. Between November 18, 2022 (the parties' meet and confer) and February 24, 2023, Qin produced over 2,500 pages of responsive documents. The documents included: (i) Qin's passport information and social security number, (ii) Qin's bank statements, (ii) corporate records of the Relevant Entities (form the People's Republic of China (the "PRC"), and Hong Kong), (iii) records of deeds and transfer documents related to Relevant Properties, (iv) Qin's Amended and Original 2021 Tax Returns, among other documents and information.

8. Attached to this declaration as **Exhibit B** is a true and correct copy of Seiden Law's email chain concering Qin's rolling production.

**Qin's Deposition**

9. On January 19, 2023, Petitioners notified Qin that they intended depose (in person) him at Petitioners' counsel's, Pillsbury Winthrop Shaw Pittman LLP, New York office.

10. Attached to this declaration as **Exhibit C** is a true and correct copy of Petitioners' Post-Judgment Deposition Notice.

11. On January 20, 2023, upon Petitioners' request, the Court held a pre-motion conference on discovery issues. ECF 106-1. Following the conference, on January 23, 2023, the Court issued an order directing that by the end of January 2023, (1) the parties must conduct a meet and confer, and (2) Qin must appear for a deposition. ECF 100.

12. On January 30, 2023, pursuant to the Court's order dated January 23, 2023, Qin was deposed by Petitioners' counsel at its New York office.

13. The Deposition lasted approximately eleven hours, starting at approximately 11:10 am (EST) and ending at approximately 10:00 pm (EST).

14. On February 9, 2023, Seiden Law received the Certified Deposition Transcript (the "Transcript") from the Court Reporter. ECF 108-11.

15. On February 14, 2023, Qin served his Errata Sheet to the Transcript ("Qin Errata Sheet") on the Court Reporter via email. On the same day, Qin served Qin Errata Sheet on the Petitioners as an exhibit of Seiden Law's February 14, 2023 letter. *See* ECF 108-9.

16. Attached to this declaration as **Exhibit D** is a true and correct copy of Qin's Errata Sheet.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 28, 2023  
New York, NY



Xintong Zhang